

Anne Dugan

June 30, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I'm very concerned about the proposed Business Opportunity Rule, R511993. I believe that in its present form it could prevent me from doing business as an Arbonne International Independent Consultant, and prevent those in my organization from doing so as well. I understand and appreciate the FTC's responsibility to protect the public from unfair and misleading business acts or practices; however I fear some of the proposed guidelines will prevent me from doing business at all, specifically not allowing me to efficiently sponsor consultants or sell Arbonne products.

One of the most difficult proposals for me to understand is the seven-day waiting period for signing up new consultants. The requirement, I'm afraid, will lead people to believe there is something wrong with the Arbonne opportunity. In addition, the Arbonne start-up cost is incredibly low and not in any way something designed to force people to spend money they don't have in order to become a consultant. The thought of having to keep specific track of how many days come in between my first and second contact with someone is daunting; not only for record keeping, but for the mere fact that when people are excited about an opportunity or product, they want to take action. If I must have people wait, there is a strong possibility they'll move on and forget their enthusiasm. This could seriously hurt the business I've worked very hard to build over the past 2 ½ years.

The proposal also states that I would have to provide all information about litigation against the company to my prospects, without regard to whether or not the company was found innocent. I fear that the mere impression of wrong doing, whether found sound or not, would also injure not only the building of my business, but my reputation and that of the company I believe in.

I am also very uncomfortable with the proposed requirement to release personal contact information about the 10 nearest consultants to me to all prospective consultants. I don't feel it's fair to disclose personal information about other consultants, some of whom I may not even know, as identity theft and privacy are very real concerns. I know I would not want anyone giving out my personal contact information to complete strangers just to comply with and FTC ruling. And, I would have to submit a request to Arbonne for the information on a near weekly basis to keep a continually updated and accurate list.

I have been an Arbonne Independent Consultant for 2 ½ years. I believe strongly in the ethical way in which we are trained to work our businesses. I have been given the opportunity to not only change my life but the lives of others by coming from a place of integrity. This is the way I intend to continue to build my business and never have I engaged in deceptive practices to further my growth with the company.

As I previously stated, I understand and appreciate the goals of the FTC in regards to protecting consumers, but in the case of this proposal have real fears that I would no longer be able to build, and help others build, successful businesses with Arbonne. I do hope that alternative means can be found that will continue to help network marketing professionals work with integrity and pride.

Thank you for your time.

Sincerely,

Anne E. Dugan